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District of Hawaii

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

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2
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at 10 o'clock and 45 min
WALTER A.Y.H. CHINN, CLERK

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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

C R 0 0 - 0 0 3 9 2 S O M

UNITED STATES OF AMERICA,) CR. NO. _____-01,-02
)
Plaintiff,) INDICTMENT
) [21 U.S.C. 846, 841(a)(1)]
vs.)
)
JONATHAN L. ALEXANDER, (01))
SCOTT KATSUKI SHIMODA, (02))
)
Defendants.)

INDICTMENT

Count 1:

The Grand Jury charges that:

From a time unknown to the Grand Jury up through and
including on or about September 19, 2000 in the District of
Hawaii and elsewhere, defendants:

JONATHAN L. ALEXANDER (hereinafter "Alexander"),
SCOTT KATSUKI SHIMODA (hereinafter "Shimoda"),

and others unknown to the Grand Jury knowingly and intentionally
conspired to distribute and to possess with intent to distribute
five-hundred grams or more of a mixture or substance containing a

detectable amount of cocaine, its salts, optical and geometric isomers, and salts of its isomers, a Schedule II narcotic controlled substance,

A violation of Title 21, United States Code, Section 841(a) (1).

Overt Acts:

In furtherance of this conspiracy and in order to attain the objects thereof, the following overt acts, among others, were committed in the District of Hawaii and elsewhere:

1. On or about September 12, 2000, Alexander tendered for delivery the following parcel at the post office at the Los Angeles International Airport, California:

One (1) Express Mail parcel bearing mailing label #EK181822086US, and addressed to Russell Ho, Suite 106, 350 Ward Avenue, Honolulu, Hi 96814, Box #125 (hereinafter "Parcel #1").

2. On or about September 12, 2000, Alexander tendered for delivery the following parcel at the post office at the Los Angeles International Airport, California:

One (1) Express Mail parcel with mailing label #EK181822090US, and addressed to Russell Ho, Suite 106, 350 Ward Avenue, Honolulu, Hi 96814, Box #125 (hereinafter "Parcel #2").

3. On or about September 19, 2000, Shimoda picked up Parcel #1 from the post office at the Honolulu International Airport, Hawaii.

4. On or about September 19, 2000 in Honolulu, Hawaii, Shimoda met with Alexander.

5. On or about September 19, 2000 in Honolulu, Hawaii,

Shimoda placed Parcel #1 in a Ford pickup truck.

All in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(B).

Count 2:

The Grand Jury further charges that:

On or about September 19, 2000, in the District of Hawaii, defendants:

JONATHAN L. ALEXANDER and
SCOTT KATSUKI SHIMODA

knowingly and intentionally attempted to possess with intent to distribute five-hundred grams or more of a mixture or substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of its isomers, a Schedule II narcotic controlled substance,

In violation of Title 21, United States Code, Sections 846,

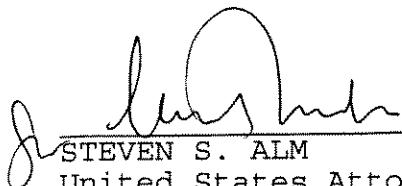
841(a)(1), and 841(b)(1)(B).

DATED: Honolulu, Hawaii, September 27, 2000.

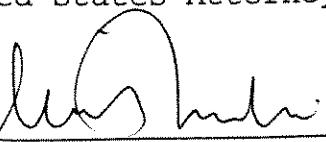
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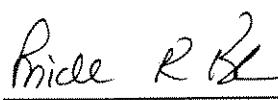
GRAND JURY FOREPERSON



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USA v. Alexander et. al., USDC-Hawaii, Indictment.